



September 17, 2025

VIA ECF

The Hon. Arun Subramanian
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *Jane Doe 3, et al. v. Indyke et al.*, Case No. 24-cv-1204-AS

Dear Judge Subramanian:

Pursuant to Paragraphs 11(C)(ii)-(iii) of Your Honor's Individual Practices in Civil Cases, Plaintiffs Allyson Ward and Jane Doe 3 hereby seek to leave to file under partial seal Plaintiffs' letter Motion to Compel and entirely under seal Exhibits A through G.

The Letter Motion to Compel has been redacted to reflect information that would identify potential victims of Epstein pursuant to the Protective Order, Dkt. 21, and because Defendants have designated the materials it quotes from as confidential. The Protective Order permits the Parties to designate as Confidential "any information that could reveal the identity of any actual or alleged victim of abuse of Jeffery E. Epstein who has not been identified publicly, including the victim's name, address, and birthdate."

Exhibits A through F are documents that Defendants have designated as confidential. Exhibit G is the Epstein Estate's privilege log, which Defendants have also designated confidential. Plaintiffs do not agree that the asserted privacy interests justify sealing of Exhibits A through G in their entirety. It is Plaintiffs' position that Exhibits A through G warrant only partial sealing of the identifying information for Epstein's victims. Plaintiffs' counsel advises Defendants' counsel that they must file, within three business days, a letter explaining the need for sealing or partial sealing of anything aside from potential victims' names in Exhibits A through G.

Respectfully submitted,

/s/ Sigrid S. McCawley
Sigrid S. McCawley
Boies Schiller Flexner LLP
401 E. Las Olas Blvd. Suite 1200
Fort Lauderdale, FL 33316
Telephone: (954) 356-0011
Fax: (954) 356-0022
Email: smccawley@bsfllp.com

Counsel for Plaintiff